

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

v.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD. d/b/a
PORNHUB.COM and HAMMY MEDIA,
LTD. d/b/a XHAMSTER.COM

Defendants.

Civil Action No.: 7:21-cv-03193-JD

**DEFENDANT MG FREESITES, LTD.'S CONSENT MOTION
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant MG Freesites, LTD., d/b/a Pornhub.com (“MG Freesites”) files this Consent Motion for Extension of Time to Respond to Plaintiff Jane Doe’s Amended Complaint (Dkt. No. 11), and in support thereof states as follows:

1. On September 30, 2021, Plaintiff filed her Complaint in this action (Dkt. 1).
2. On November 18, 2021, Plaintiff filed her Amended Complaint.
3. On January 24, 2022, Defendant MG Freesites executed a Waiver of Service (Dkt. 14) requiring it to respond to Plaintiff’s Amended Complaint on or before April 25, 2022.¹
4. Defendant MG Freesites anticipates filing a Motion to Dismiss the Complaint in the instant action under Rule 12(b)(6) of the Federal Rules Civil Procedure. However, on June 24, 2022, Plaintiff filed a Motion to Amend her Complaint and the proposed Third Amended Complaint contains new parties and new causes of action against MG Freesites. (Dkt. No. 83).

¹ The Waiver of Service was filed with the Court on or about February 3, 2022.

Plaintiff's Motion indicated that no Defendants opposed the Motion to Amend. Accordingly, Plaintiff and counsel for MG Freesites have agreed that it is in the interests of judicial economy and efficiency to briefly defer MG Freesites' response to the Amended Complaint to allow the Court to rule on Plaintiff's Motion to Amend and then timely respond to the Third Amended Complaint.

5. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge periods of time for good cause where, as here, the requested extension is made before the deadline. The parties agree that the interests of judicial economy and efficiency justify the requested extension.

6. The requested extension is not sought for dilatory reasons or for any other improper purpose, will not affect any other deadlines, and will not prejudice any party or the Court. The parties agree that neither will be prejudiced by the requested extension of time.

7. Plaintiff consents to Defendant MG Freesites's request.

WHEREFORE, Defendant MG Freesites respectfully requests this Court enter an order enlarging the time within which to respond to the Complaint by thirty (30) days, or until and including July 27, 2022.

WE SO MOVE:

DATED: June 27, 2022

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,
P.A.

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Attorneys for Defendant MG Freesites, Ltd.

WE CONSENT:

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